

United Lates Department of the Interior





IN REPLY REFER TO:



BUREAU OF LAND MANAGEMENT Moab District San Rafael Resource Area 900 North 700 East Price, Utah 84501

> 3809 (UTU-69860) (UT-067)

JAN 1 8 1995

Mr. John E. Welsh 4780 Bonair Street Holladay, Utah 84117

Dear Mr. Welsh:

We have received and reviewed your report concerning the vegetation and reclamation of the gypsum mine operated by Phil Palmer and while we concur with some of your suggestions, others we have reservations with.

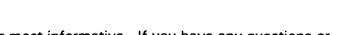
Transplanting shadscale and Indian ricegrass and furrowing are good ideas, as is sloping to a north slope as much as possible. Adding Castle Valley saltbush and Green Mormon tea to the seed mixture would be acceptable providing no other species are replaced.

Terracing is not a viable reclamation technique as the mine is located in a Class II Visual Resource Management area which requires reclamation to approximate original contours and does not allow for that kind of topographic modification. We do not agree with limiting the seed mixture to only a few species, as we believe a broad-based seed mixture will be better able to take advantage of the different microclimatic sites occurring in the area.

Allowing the gypsiferous top soil to flush down South Salt Wash would run counter to the Colorado River Basin Salinity Control Forum Intercepted Groundwater Policy, which requires limiting the amount of salinity in the Colorado River by controlling the salinity in the runoff of its tributaries. Since limestone does not contribute to salinity, it is not considered to be a problem that gypsiferous material would be. We do not usually require seeding with species such as rabbitbrush, as such plants have usually recolonized disturbed areas without any reseeding efforts.

There is no problem with running a few test plots, provided that the test plots only aggregate to a fraction of an acre. If you propose to run large test plots or use reclamation techniques on most of the mine site not included in the approved plan of operations, then a plan amendment must be submitted.

Reclamation is considered to be complete when the disturbed site has been recontoured, reseeded, and the vegetation has come back to at least a 75 percent density of the original plant density.



Thank you for submitting your report, it was most informative. If you have any questions or further comments, please feel free to contact Neil Simmons of my staff at 801-637-4584.

Sincerely,

PENELOPE J. DUNN

Area Manager

cc: Bryant Anderson

Emery County Planning and Zoning

P.O. Box 297

Castle Dale, Utah 84513

Kiran Bhayani

Utah Department of Environmental Health

Division of Water Quality

P.O. Box 16690

Salt Lake City, Utah 84116-0690

Tony Gallegos

Division of Oil, Gas and Mining

355 West North Temple Street

3 Triad Center

Salt Lake City, Utah 84180-1203